

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

AMERICAN TOWER ASSET SUB, LLC,

Plaintiff,

vs.

PTA-FLA, INC. d/b/a Cleartalk,

Defendant.

Case No. 6:15-cv-03700-MGL

**DEFENDANTS' RESPONSES
TO LOCAL RULE 26.01
INTERROGATORIES**

Plaintiff American Tower Asset Sub, LLC ("Plaintiff"), responding to this District Court's Local Rule 26.01 Interrogatories, states the following:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

RESPONSE: Plaintiff is not aware of any subrogation interest in any claim in this case at this time.

B. As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Plaintiff submits that the entire case should be tried nonjury, because the case presents relatively straightforward legal issues which can be most efficiently and cost-effectively resolved by the Court.

C. State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: Plaintiff is not a publicly-owned company; (1) Plaintiff is a wholly owned subsidiary of American Tower Corporation, which is a publicly traded company; (2) See Answer (C)(1) above; and (3) See Answer (C)(1) above.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civ. Rule 3.01 (D.S.C.).

RESPONSE: Plaintiff's complaint seeks a declaratory judgment that will govern the rights of the parties as to certain license/lease agreements regarding cellular antennae located on cellular towers; the location of the majority of the cellular towers that pertain to the license/lease agreements are located in this Division. Plaintiff also seeks past due rent/fees associated with the parties' license/lease agreements, and the majority of those agreements, as noted, pertain to cellular towers located in this Division.

E. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

RESPONSE: No.

F. If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: N/A.

G. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

RESPONSE: N/A.

Respectfully submitted,

/s/ Jeffrey S. Tibbals

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September 16, 2015
Charleston, South Carolina